

JP:CAC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

-against-

(18 U.S.C. § 371)

AMOS HARRIS and  
RUNEY MAH,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

DANIEL PATRICK MCGOLDRICK, being duly sworn, deposes and says that he is a Special Agent with the United States Secret Service ("USSS"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between January 21, 2010, and February 2, 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendants AMOS HARRIS and RUNEY MAH, with intent to defraud, did conspire to pass, utter, present, offer, broker, issue, sell and possess, within the United States, false and fictitious instruments, documents, and other items appearing, representing, purporting and contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of an organization, to wit:

instruments purporting to be United States Federal Reserve Notes, in violation of Title 18 United States Code, Section 514(a)(2).

(Title 18 United States Code Section 371)

The source of your deponent's information and the grounds for his belief are as follows<sup>1</sup>:

1. I have been a Special Agent with the Secret Service for approximately two years. I am familiar with the facts and circumstances of this matter from my personal participation in this investigation, a review of case files and reports, and conversations with other law enforcement officers and agents, investigators and witnesses.

2. On or about January 21, 2010, USSS agents received a telephone call from a special agent with the United States Bureau of Immigration and Customs Enforcement ("ICE") reporting a scheme involving the manufacturing of United States Federal Reserve Notes. The victim of the scheme was a store owner in Staten Island, New York (the "Store Owner").

3. On or about January 22, 2010, USSS agents met with the Store Owner at his store located in Staten Island, New York. The Store Owner informed USSS that he was approached the day before by two males, later identified as defendants HARRIS and MAH, about a business that could make him some money. The

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<sup>1</sup>/Because the purpose of this affidavit is merely to set forth probable cause to arrest, I have not indicated all of the facts and circumstances of which I am aware.

defendants HARRIS and MAH returned the next morning of January 22, 2010 and showed the Store Owner a demonstration whereby they took one \$20 United States Federal Reserve Note and transformed it into four \$20 United States Federal Reserve Notes. The defendants HARRIS and MAH performed this demonstration using various unknown chemicals and powder, along with a block of black paper that they claimed to be United States Federal Reserve Notes in \$100 denominations covered in a black substance. The defendants HARRIS and MAH then offered the Store Owner the opportunity to double \$50,000 to \$80,000 utilizing the same process.

4. On or about February 1, 2010, the defendants HARRIS and MAH returned to the Store Owner's store along with two other unknown males. They inquired about the status of their prior offer, and reiterated their request for \$50,000 to \$80,000. The Store Owner told the defendants that his brother-in-law would likely have the money for him tomorrow, and that he would meet the defendants at a location in Staten Island. The defendants HARRIS and MAH told the Store Owner to bring various items to the location, including a safe, plastic tub, adhesive tape and gloves.

5. On or about February 2, 2010, the defendants HARRIS and MAH met the Store Owner and an undercover ICE agent (the "UC") at a motel in Staten Island, New York. The defendants

HARRIS and MAH brought two containers of the unknown chemicals and powder that they claimed would transform genuine United States Federal Reserve Notes. The defendants HARRIS and MAH also brought a block of black paper that they claimed was genuine United States Federal Reserve Notes covered in a black substance (the "Black Paper Block"). The defendants proceeded to demonstrate and explain to the Store Owner and the UC how they could double their money. The defendants told them that they would take \$55,000 from the Store Owner and UC and combine it into the Black Paper Block. The defendants further explained that combining the \$55,000 with the Black Paper Block, and then adding the unknown chemicals and powder to the entire package would initiate a chemical reaction. The defendants HARRIS and MAH claimed that this chemical reaction would remove the unknown black substance off of the Black Paper Block revealing genuine United States Federal Reserve Notes in \$100 denominations. The defendants further stated that this would double the \$55,000 that the Store Owner and the UC provided.

6. Both defendants were arrested subsequent to the demonstration at the Staten Island motel. At that time, USSS agents recovered the Black Paper Block wrapped in clear plastic from the motel room, along with a plastic bag containing purple colored powder and two large black jugs containing an unknown liquid.

7. After being advised of his Miranda rights and signing a waiver of rights, the defendant HARRIS stated, in sum and substance, that he brought the items to "scam" the Store Owner "for his money."

8. After being advised of his Miranda rights and signing a waiver of rights, the defendant MAH stated, in sum and substance, that this was just a "game in order to take some cash" from the Store Owner.

WHEREFORE, your deponent respectfully requests that the defendants AMOS HARRIS and RUNEY MAH be dealt with according to law.

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DANIEL PATRICK MCGOLDRICK  
Special Agent  
United States Secret Service

Sworn to before me this  
3rd day of February, 2010

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THE HONORABLE STEVEN M. GOLD  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK